

July 15, 2019

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

**Re:   *Numbering Resource Optimization*, CC Docket No. 99-200**

Dear Ms. Dortch:

The comments in this proceeding demonstrate that the Commission should deny the New Hampshire Public Utilities Commission's (NHPUC) request for delegated authority to implement individual telephone number pooling in the 603 area code.<sup>1</sup> The Maine Public Utilities Commission, however, has coupled its comments with an identical request to that of the NHPUC, but for the 207 area code.<sup>2</sup> To the extent the Commission finds that Maine's request is appropriately combined with its comments, the Commission should deny that request for the same reasons USTelecom, CTIA and ATIS described in their comments. The same public policy considerations weighing against the NHPUC's petition, which have national implications, apply with equal force to Maine's request.

Please contact me with any questions.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_

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<sup>1</sup> See Comments of The Alliance for Telecommunications Industry Solutions (ATIS), CC Docket 99-200 (filed July 1, 2019); Comments of CTIA, CC Docket 99-200 (filed July 1, 2019); Comments of USTelecom—The Broadband Association, CC Docket 99-200 (filed July 1, 2019).

<sup>2</sup> Petition by the Maine Public Utilities Commission for Additional Delegated Authority to Implement Number Optimization Measures in Support of the Petition by the New Hampshire Public Utilities Commission for Additional Delegated Authority to Implement Number Optimization Measures in the 603 Area Code, CC Docket 99-200 (filed June 26, 2019).